MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: 112016-001

Project Number: 2016-09-001
Installation Number: 183-0242

Parent Company: Baue Funeral Homes, Inc.

Parent Company Address: 608 Jefferson Street, St. Charles, MO 63301

Installation Name: Baue Care and Cremation Center

Installation Address: 4175 Shady Springs Lane, St. Peters, MO 63376

Location Information: St. Charles County, S28, T47N, R4E

Application for Authority to Construct was made for:
Installation of two-chamber Facultatieve Technologies FT III SE human cremator. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

☐ Standard Conditions (on reverse) are applicable to this permit.

☑ Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Prepared by
Sam Anzalone
New Source Review Unit

Director or Designee
Department of Natural Resources

NOV 02 2016

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant sources(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant sources(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
http://dnr.mo.gov/regions/

SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Baue Care and Cremation Center
St. Charles County, S28, T47N, R4E

1. Mercury Emission Limitation
   A. Baue Care and Cremation Center shall emit less then 0.01 tons of mercury from the human crematory (EP-01) in any consecutive 12-month period.

   B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 1.A.

2. Process Requirements for the Human Crematory (EP-01)
   A. Baue Care and Cremation Center shall burn exclusively non-infectious human bodies or body parts (as defined in the Project Description) and containers not containing chlorine and shall only use natural gas as fuel in the Facultative Technologies FT III SE.

   B. Charging of waste during burn cycles is prohibited.

   C. The crematory shall be equipped with a continuous chart recorder that monitors, displays and records the temperature in the final combustion chamber with an accuracy of two percent (±2%).

   D. Baue Care and Cremation Center shall maintain the temperature in the final combustion chamber at or above 1600 degrees Fahrenheit.

   E. Baue Care and Cremation Center shall maintain an accurate record of the number of cremations and the total mass of remains cremated at this installation per month.

3. Opacity
   The crematory (EP-01) shall have an opacity of less than ten percent (10%) at all times.

SPECIAL CONDITIONS:
The permittee is authorized to construct and operate subject to the following special conditions:

4. Requirements for Operators of the Human Crematory (EP-01)

   A. All crematory operators shall attend a training program equivalent to that developed by the American Society of Mechanical Engineers (ASME), by the crematory manufacturer or by an individual with more than one (1) year experience in the operation of the crematory. The training shall include basic combustion theory, operating procedures, monitoring of combustion control parameters and all emergency procedures to be followed if the crematory should malfunction or exceed operating parameters.

   B. The crematory operator shall have the essential steps necessary for satisfactory operation of the crematory readily available to him or her in an easy to read and follow manual.

5. Restriction of Emission of Odors
   If a continued situation of verified nuisance odors exists in violation of 10 CSR 10-6.165, the Director may require through written notice that Baue Care and Cremation Center submit within ten days a corrective action plan adequate to timely and significantly mitigate the odors. Baue Care and Cremation Center shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be in violation of this permit.

6. Removal of Equipment
   A. Baue Care and Cremation Center shall remove IE 43-PPI, Power-Pak II Pet cremator from the installation before the operation of Facultatieve Technologies FT III SE human cremator.

7. Record Keeping and Reporting Requirements
   A. Baue Care and Cremation Center shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

   B. Baue Care and Cremation Center shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW
Project Number: 2016-09-001
Installation ID Number: 183-0242
Permit Number: 112016-001

Installation Address:
Baue Care and Cremation Center
4175 Shady Springs Lane
St. Peters, MO 63376

Parent Company:
Baue Funeral Homes, Inc.
608 Jefferson Street
St. Charles, MO 63301

St. Charles County, S28, T47N, R4E

REVIEW SUMMARY

- Baue Care and Cremation Center has applied for authority to install a two-chamber Facultatieve Technologies FT III SE human cremator.
- The application was deemed complete on September 13, 2016.
- HAP emissions are expected from the proposed equipment. HAPs of concern from this process are from the combustion of human remains and natural gas. Potential mercury and dioxin emission from the human cremator are above the SMAL. The emissions from mercury are conditioned below the SMAL which indirectly conditions the dioxin below the SMAL.
- None of the New Source Performance Standards (NSPS) apply to the installation.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of criteria pollutants are below de minimis levels. Section (1)(B) requires all incinerators to obtain construction permits.
- This installation is located in St. Charles County, a nonattainment area for the 8-hour ozone standard and the PM-2.5 standard and an attainment area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels and potential HAP emissions are conditioned below their respective SMALs.

- Emissions testing is not required for the equipment as a part of this permit. Stack testing was conducted on a similar unit and approved by the Air Pollution Control Program.

- No Operating Permit is required for this installation.

- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Baue Care and Cremation Center is a de minimis source under construction permits. This facility has a basic operating permit, however due to rule change to 10 CSR 10-6.065, incinerators are no longer required to obtain an operating permit unless the installation is over de minimis levels. The installation's PTE is below de minimis levels therefore does not need to apply for a basic operating permit. Baue Care and Cremation Center is located in Saint Peters, MO. They were permitted as an pet crematory, however the Power Pak II IE pet cremator has ceased operations and will be removed from the location prior to the installation of the Facultatieve Techologies FT III Human Cremator. There will be ancillary equipment consisting of a processor for the cremated remains, a transfer cabinet and an auto loader used for charging the new cremator. The new cremator will only be used for human cremation. The installation is no longer authorized to cremate pets.

The following New Source Review permits have been issued to Baue Care and Cremation Center from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
052010-005	Installation of IE 43-PPII, Power-Pak II Pet (animal incinerator)

PROJECT DESCRIPTION

Baue Care and Cremation Center is installing a Facultatieve Technologies FT III SE human cremator. This cremation unit is two-chambered, each chamber powered by a natural gas burner, and has a maximum hourly design rate (MHDR) of 200 pounds per hour (equivalent to 8 cremations per 12 hours). The primary burner has an MHDR of 0.922 MMBtu/hr, and the secondary burner has and MHDR of 1.195 MMBtu/hr. The secondary chamber maintains a minimum of 1600 degrees and minimum retention time of 2 seconds. The internal oxygen content within the chambers, and in the flue gas prior to being emitted, is less than or equal to 6 percent (%); this aids in preventing visible emissions/keeping the opacity sufficiently below the 10% requirement. This oxygen

regulation is an upstream/preventative control method rather than a downstream/reactive control method. For ash removal after the incineration process is complete, the ashes are hand-raked into a cooling bin, and then the ashes are allowed to cool before removal from the closed system occurs. There are no control devices in place on this equipment.

For a previous permit installing a similar unit, Facultatieve Technologies submitted stack test results from two different performance tests in order to demonstrate compliance with Missouri's requirements for human crematory incinerator units. These requirements include that the crematory achieve a combustion efficiency of 99.9%, that the maximum particulate concentration in the crematory's stack gas is less than 0.09 grains per dry standard cubic feet and that the crematory's opacity does not exceed 10%. These requirements were developed to ensure proper combustion, which ensures destruction of HAPs.

The two performance tests that were submitted to the Missouri Air Pollution Control Program were compiled in order to determine whether or not this incinerator is an approved unit. The tests were also submitted in order to avoid requirements for additional/recurring performance testing. One performance test was done at the Swan Point Crematory in Providence, Rhode Island on February 5th and 6th of 2015; the other performance test was done at the Cremation Center of Arizona in Phoenix, Arizona on December 16 of 2014. Each test neglected a different one of the three measured parameters, but the Testing and Emissions Unit of Missouri Air Pollution Control Program—through a combined analysis of the two performance tests—concluded that there was sufficient data to qualify this incinerator as an approved unit for future determinations.

The crematory is permitted to cremate non-infectious human bodies and body parts. The Air Pollution Control Program's definition of this term is human bodies and body parts that do not fit the definition of medical/infectious waste as defined in the Code of Federal Regulations, 40 CFR 60.51, *Standards of Performance for New Stationary Sources*, Subpart Ec—"Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996." The rule defines medical/infectious waste as:

Medical/infectious waste means any waste generated in the diagnosis, treatment, or immunization of human beings or animals, in research pertaining thereto, or in the production or testing of biologicals that are listed in paragraphs (1) through (7) of this definition. The definition of medical/infectious waste does not include hazardous waste identified or listed under the regulations in part 261 of this chapter; household waste, as defined in §261.4(b)(1) of this chapter; ash from incineration of medical/infectious waste, once the incineration process has been completed; human corpses, remains, and anatomical parts that are intended for interment; and domestic sewage materials identified in §261.4(a)(1) of this chapter.

(1) Cultures and stocks of infectious agents and associated biologicals, including: cultures from medical and pathological laboratories; cultures and stocks of

infectious agents from research and industrial laboratories; wastes from the production of biologicals; discarded live and attenuated vaccines; and culture dishes and devices used to transfer, inoculate, and mix cultures.

(2) Human pathological waste, including tissues, organs, and body parts and body fluids that are removed during surgery or autopsy, or other medical procedures, and specimens of body fluids and their containers.

(3) Human blood and blood products including:
   (i) Liquid waste human blood;
   (ii) Products of blood;
   (iii) Items saturated and/or dripping with human blood; or
   (iv) Items that were saturated and/or dripping with human blood that are now caked with dried human blood; including serum, plasma, and other blood components, and their containers, which were used or intended for use in either patient care, testing and laboratory analysis or the development of pharmaceuticals. Intravenous bags are also include in this category.

(4) Sharps that have been used in animal or human patient care or treatment or in medical, research, or industrial laboratories, including hypodermic needles, syringes (with or without the attached needle), pasteur pipettes, scalpel blades, blood vials, needles with attached tubing, and culture dishes (regardless of presence of infectious agents). Also included are other types of broken or unbroken glassware that were in contact with infectious agents, such as used slides and cover slips.

(5) Animal waste including contaminated animal carcasses, body parts, and bedding of animals that were known to have been exposed to infectious agents during research (including research in veterinary hospitals), production of biologicals or testing of pharmaceuticals.

(6) Isolation wastes including biological waste and discarded materials contaminated with blood, excretions, exudates, or secretions from humans who are isolated to protect others from certain highly communicable diseases, or isolated animals known to be infected with highly communicable diseases.

(7) Unused sharps including the following unused, discarded sharps: hypodermic needles, suture needles, syringes, and scalpel blades.

Baue Care and Cremation Center shall remove the pet crematory prior to installation of the Faculatatieve Technologies FT III SE human cremator.

EMISSIONS/CONTROLS EVALUATION

The emission rates for PM_{10}, NO_X, VOC, SO_X, CO, mercury, dioxin, and polycyclic aromatic hydrocarbons used in this review were obtained from stack tests conducted on

a similar cremator model. The stack tests were performed at the nominal burning capacity of 200 pounds per hour. The emission factors used in the analysis of HAP emissions was obtained from WebFIRE (SCC 3-15-021-01), EPA's online emissions factor repository, retrieval, and development tool. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year.) New installation conditioned potential emissions account for the indirect limitations of additional pollutants which are established by the direct mercury emission limitation of 0.01 tons per year. The following table provides an emissions summary for this project.

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory *De Minimis* Levels	Existing Potential Emissions	Existing Actual Emissions (2015 EIQ)	Potential Emissions of the Project	New Installation Conditioned Potential
PM	25.0	N/D	N/D	0.88	0.202
PM_{10}	15.0	0.88	0.089	0.94	0.214
$PM_{2.5}$	10.0	N/D	N/D	0.94	0.214
SOx	40.0	0.27	0.041	0.87	0.199
NOx	40.0	1.35	0.117	4.80	4.80
VOC	40.0	1.35	0.195	0.23	0.051
CO	100.0	0.05	0.098	1.63	0.373
HAPs	25.0	0.44	0	0.28	0.064
Mercury	0.01[a]	N/D	N/D	0.0438	<0.01
Dioxin	6×10^{-7}[b]	N/D	N/D	8.76×10^{-7}	2.0×10^{-7}

N/A = Not Applicable; N/D = Not Determined
[a]SMAL for Mercury
[b]SMAL for Dioxin

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of Mercury (Hg) are conditioned below its SMAL and potential emissions of dioxins are indirectly conditioned below its SMAL. All other remaining pollutants are below their de minimis levels.

APPLICABLE REQUIREMENTS

Baue Care and Cremation Center shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements.

Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Start-Up, Shutdown, and Malfunction Conditions,* 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information,* 10 CSR 10-6.110
    - Per 10 CSR 10-6.110(4)(B)2.B(II) and (4)(B)2.C(II) a full EIQ is required for the first full calendar year the equipment (or modifications) approved by this permit are in operation.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 31, 2016, received September 1, 2016, designating Baue Funeral Homes, Inc. as the owner and operator of the installation.

Attachment A –Mercury Compliance Worksheet

Baue Care and Cremation Center
St. Charles County, S28, T47N, R4E
Project Number: 2016-09-001
Installation ID Number: 183-0242
Permit Number:

112016-001

This sheet covers the period from ____________ to ____________.
(month, year) (month, year)

Month	Cremations	Mercury Emission Factor (lbs/body)	[1]Monthly Mercury Emissions (lbs)	[2]12-Month Rolling Total Mercury Emissions (pounds/year)
Example	*10*	*0.015*	*0.15*	*< 20.0*
		0.015		
		0.015		
		0.015		
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		0.015		

[1]The Monthly Mercury Emissions (lbs) are calculated by multiplying the number of cremations by the Mercury Emission Factor (lbs/body).
[2]The 12-Month Rolling Total Mercury Emissions (lbs/year) are a rolling total calculated by adding the Monthly Mercury Emissions (lbs) to the Monthly Mercury Emissions (lbs) of the previous eleven (11) months.
A 12 month rolling total total of less than **20.0** lbs Mercury in any consecutive 12-month period indicates compliance

APPENDIX A

Abbreviations and Acronyms

% ..... percent
°F ..... degrees Fahrenheit
acfm ..... actual cubic feet per minute
BACT..... Best Available Control Technology
BMPs..... Best Management Practices
Btu..... British thermal unit
CAM ..... Compliance Assurance Monitoring
CAS ..... Chemical Abstracts Service
CEMS ..... Continuous Emission Monitor System
CFR ..... Code of Federal Regulations
CO ..... carbon monoxide
CO_2..... carbon dioxide
CO_2e..... carbon dioxide equivalent
COMS..... Continuous Opacity Monitoring System
CSR..... Code of State Regulations
dscf..... dry standard cubic feet
EIQ ..... Emission Inventory Questionnaire
EP..... Emission Point
EPA ..... Environmental Protection Agency
EU..... Emission Unit
fps ..... feet per second
ft..... feet
GACT ..... Generally Available Control Technology
GHG ..... Greenhouse Gas
gpm..... gallons per minute
gr..... grains
GWP..... Global Warming Potential
HAP..... Hazardous Air Pollutant
hr..... hour
hp ..... horsepower
lb ..... pound
lbs/hr..... pounds per hour
MACT ..... Maximum Achievable Control Technology
$\mu g/m^3$..... micrograms per cubic meter
m/s ..... meters per second
Mgal ..... 1,000 gallons
MW..... megawatt
MHDR..... maximum hourly design rate
MMBtu ... Million British thermal units
MMCF..... million cubic feet
MSDS..... Material Safety Data Sheet
NAAQS .. National Ambient Air Quality Standards
NESHAPs National Emissions Standards for Hazardous Air Pollutants
NO_x..... nitrogen oxides
NSPS..... New Source Performance Standards
NSR..... New Source Review
PM..... particulate matter
$PM_{2.5}$..... particulate matter less than 2.5 microns in aerodynamic diameter
PM_{10} ..... particulate matter less than 10 microns in aerodynamic diameter
ppm..... parts per million
PSD..... Prevention of Significant Deterioration
PTE ..... potential to emit
RACT ..... Reasonable Available Control Technology
RAL..... Risk Assessment Level
SCC..... Source Classification Code
scfm..... standard cubic feet per minute
SDS..... Safety Data Sheet
SIC ..... Standard Industrial Classification
SIP..... State Implementation Plan
SMAL ..... Screening Model Action Levels
SO_x..... sulfur oxides
SO_2..... sulfur dioxide
tph..... tons per hour
tpy..... tons per year
VMT..... vehicle miles traveled
VOC..... Volatile Organic Compound

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director
DEPARTMENT OF NATURAL RESOURCES
dnr.mo.gov

NOV 0 2 2016

Mr. Colby Hitchcock
Manager
Baue Care and Cremation Center
608 Jefferson Street
St. Charles, MO 63301

RE: New Source Review Permit - Project Number: 2016-09-001

Dear Mr. Hitchcock:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at the following website: http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is

received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

If you have any questions regarding this permit, please do not hesitate to contact Sam Anzalone, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Susan Heckenkamp
New Source Review Unit Chief

SH:hjj

Enclosures

c: St. Louis Regional Office
PAMS File: 2016-09-001

Permit Number:
112016-001